

# EXHIBIT A

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

In re: Chapter 11  
DELPHI CORPORATION, et al, Case No. 05-44481 (RDD)  
Debtors. (Jointly Administered)

DEPOSITION OF JAMES WEBBER

Taken by Nu-Tech Plastics Engineering on the 21st day of  
December, 2007, at 5725 Delphi Drive, Troy, Michigan, at  
1:00 p.m.

APPEARANCES:

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RECORDED BY: Debbie J. Williams, CER 7981  
Certified Electronic Recorder  
Network Reporting Corporation  
1-800-632-2720

RE: DELPHI CORPORATION, ET AL

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1 A It was tracked through what the systems called "GPDS,"  
2 Global Product Description System.

3 Q How far down does that break the components of a vehicle?

4 A All the way down to the individual component; from the  
5 uppermost vehicle assembly to the individual component.

6 Q Okay. I think you know that we are here primarily about a  
7 part -- GM's part number 25160694; correct?

8 A That is correct. I know that.

9 Q According to your declaration you did conduct a search in  
10 the Global Product Description System regarding that part?

11 A I directed that a search be done, yes.

12 Q Okay. And I have here in front of me probably more than a  
13 thousand pages of a spreadsheet like document and is this a  
14 document that you directed?

15 A There were two different documents. Don't be confused by  
16 what that is.

17 Q Okay.

18 A May I look at it, please?

19 Q Yes. I think there's a blue sheet separating one from the  
20 other.

21 (Witness reviews document)

22 A Yes, to clarify the Global Product Description System takes  
23 a part and any individual component within that part will  
24 roll up to that upper assembly part number. What you see  
25 here (indicating) are the payments associated with the upper

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1 assembly parts number. This is a Daycor record.

2 Q Right. That I understand. But the documents that are  
3 contained in that notebook were produced at your request?

4 A Absolutely true. I directed that it be done. Specifically  
5 I asked someone that it be done and they pulled it out of  
6 the Daycor system which is General Motors' payable system.

7 Q So tell me, if you would, please, for each entry --

8 A Yes.

9 Q -- what -- strike that. The columns is a part number  
10 column; right?

11 A Yes, ma'am; yes.

12 Q And oftentimes the part number is not the 25160694?

13 A That is correct.

14 Q Does that mean that the part number that's listed on this  
15 document is a part which contains as a component 25160694?

16 A The part number that we are specifically speaking about  
17 today is one of the components that rolls up into an upper  
18 assembly number so there would be multiple assembly parts  
19 numbers containing the part.

20 Q Okay. Because there are a number of --

21 A Number of different part numbers, a number of different  
22 suppliers, yes.

23 Q That part was used in a number of different fuel pump  
24 assemblies?

25 A Fuel tank assemblies, yes.  
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1 Q Or fuel tank. Okay. The Daycor documents reflect each  
2 assembly that contain that part which was purchased by  
3 General Motors?

4 A Yes, ma'am. The Daycor record reflects the receipt. In  
5 this case we would not have received a component  
6 individually. We received it as part of the upper assembly.  
7 The Daycor record reflects all the payments that were made  
8 and all the receipts that were entered into Daycor during  
9 the time frame requested.

10 Q Okay.

11 A The assumption of course being that that part had to be part  
12 of the assembly otherwise it's non-functional.

13 Q Right. And the prices would be the price for the entire  
14 assembly?

15 A Yes, ma'am. That is correct.

16 Q Do you know -- strike that. Can you tell from the documents  
17 contained in this notebook how many parts 0694 were used by  
18 General Motors that were not purchased from an outside  
19 supplier?

20 A The component -- the part comes in as part of the assembly.  
21 Any purchases outside of those known assemblies I would have  
22 no idea. There was not a contract in place for the  
23 individual components so there's therefore no way to receive  
24 the material.

25 Q Daycor as a database would not include information about

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1 parts manufactured by General Motors itself; correct?

2 A May I clarify the question?

3 Q Sure.

4 A If you're asking me if there's any way to tell who produced  
5 a component of that tank I would not know that.

6 Q All right.

7 A An assumption of course is that there is a component in  
8 every part though -- in every assembly.

9 Q Do you know whether General Motors itself in 1999 or 2000  
10 produced any parts 0694 in-house?

11 A General Motors?

12 Q Right.

13 A No, they did not.

14 Q And how do you know that?

15 A To my knowledge they did not. To my knowledge there's no  
16 tooling available for us to do that.

17 Q All right. Did Delphi Automotive Systems produce any parts  
18 0694 in 1999 or 2000?

19 A I would not know that.

20 Q The assemblies that are listed in the exhibits to your  
21 declaration, would any of those assemblies have been  
22 manufactured by Delphi?

23 A I'm not sure. I do not understand the question.

24 Q The documents list the supplier; correct?

25 A Yes, that's correct.

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1 Q Oftentimes Delphi Energy and Engine Management comes up as a  
2 supplier on this list.

3 A As the supplier for the complete fuel tank?

4 Q Apparently.

5 A Well, may I look?

6 Q Sure.

7 (Counsel hands document to witness)

8 A Okay. Delphi Engine and -- based on assuming the price  
9 being that I would assume Delphi was responsible for  
10 producing the entire assembly, yes.

11 Q Do you know from whom Delphi on those particular items would  
12 have obtained the specific part 0694?

13 A I do not.

14 Q Is there any way to find out the source of that specific  
15 part for any of the completed assemblies that are listed in  
16 the exhibits to your declaration?

17 A I would not know how that would be done.

18 Q Do you know whether -- strike that. You've indicated that  
19 General Motors itself did not produce any parts 0694  
20 in-house in 1999; correct?

21 A Correct.

22 Q And the same is true for 2000?

23 A We do not have the capacity or ability or the tooling to  
24 produce that part.

25 Q Are you aware of the fact that at some point in 1997 General  
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1 Motors had two tools to produce that part?

2 A I do not know that.

3 Q Do you know whether -- did you know that Nu-Tech used two  
4 tools belonging to either GM or Delphi in '97 and '98 to  
5 produce that part?

6 A I knew nothing of Nu-Tech until my executive director  
7 requested that we pull the information that's shown here. I  
8 had literally never heard of the company.

9 Q Do you know whether General Motors ever produced part 0694  
10 in-house?

11 A To the best of my knowledge, no.

12 Q Do you know whether Delphi Automotive Systems, while it was  
13 still a division of General Motors, ever produced part 0694?

14 A I do not know that.

15 Q Is there any way to find out whether they did?

16 A I do not know a way to find that out.

17 Q Are you aware of the fact that General Motors has  
18 represented during the course of this litigation that as a  
19 result of a labor strike in 1998 General Motors agreed with  
20 the UAW to bring part 0694 in-house, meaning produce that  
21 part only with --

22 A I have no knowledge of that, no. My extent of the knowledge  
23 of this was to pull the upper assemblies and to pull the  
24 payments associated with those upper assemblies for the time  
25 frame requested and that's my knowledge of this issue.

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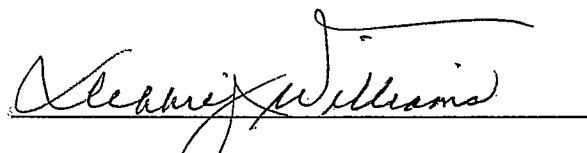
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2  
3  
4  
5 I certify that this transcript, consisting of 16 pages, is a  
6 complete, true and correct record of the testimony of James  
7 Webber held in this case on December 21, 2007.

8 I also certify that prior to taking this deposition, James  
9 Webber was duly sworn to tell the truth.  
10  
11  
12  
13  
14  
15  
16  
17

18 December 28, 2007

  
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